



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

JAM/CRH/MS  
F. #2021R01110

271 Cadman Plaza East  
Brooklyn, New York 11201

November 30, 2023

By ECF and Email

David G. Lazarus, Esq.,  
Michael K. Fee, Esq.,  
Verrill Dana  
1 Federal Street, 20th Floor  
Boston, MA 02210  
dlazarus@verrill-law.com  
mfee@verrill-law.com  
*Attorneys for Alexey Brayman*

Nora Hirozawa, Esq.,  
Earl Alexander Kirkland, III, Esq.,  
Federal Defenders of New York  
One Pierrepont Plaza, 16th Floor  
Brooklyn, NY 11201  
earl\_kirkland@fd.org  
nora\_hirozawa@fd.org  
*Attorneys for Vadim Yermolenko*

Sabrina P. Shroff, Esq.,  
80 Broad Street, 19th Floor  
New York, NY 20004  
sabrinashroff@gmail.com  
*Attorney for Vadim Konoshchenok*

Re: United States v. Yevgeniy Grinin et al.  
Criminal Docket No. 22-409 (S-2) (HG)

Dear Counsel:

Please find, at the USAfx file exchange location provided to you via email, materials that are being produced in accordance with the government's discovery obligations. These materials are being produced pursuant to the Supplemental Protective Order in this matter. See ECF No. 81. Pursuant to that Order, some of the items have been marked as "Sensitive Discovery" and should be handled accordingly. The government also requests reciprocal discovery from the defendant.

**I. The Government's Discovery**

Please find enclosed the following materials:

Description	Bates Begin	Bates End
Department of Commerce Reports <b>(Sensitive Discovery)</b>	001441	001492

Description	Bates Begin	Bates End
Global Test Equipment, Inc. Records <b>(Sensitive Discovery)</b>	01493	001547
Keysight Technologies Records <b>(Sensitive Discovery)</b>	001548	001548
Records Associated with Items Seized in Estonia <b>(Sensitive Discovery)</b>	001549	001680
Deutsch Bank Records	001681	001694
SpectraDynamics Records <b>(Sensitive Discovery)</b>	001695	001740
ValueTronics Records <b>(Sensitive Discovery)</b>	001741	001800
Draft Transcription of Interview <b>(Sensitive Discovery)</b>	001801	002000
Department of Commerce License Determinations	002001	002026

Very truly yours,

BREON PEACE  
United States Attorney

By: /s/ Matthew Skurnik  
Artie McConnell  
Craig R. Heeren  
Matthew Skurnik  
Assistant U.S. Attorneys  
(718) 254-6231

cc: Clerk of the Court (HG) (by ECF) (without enclosures)